

1 Rick Hernandez  
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5 Attorney for Jorge Ballesteros

6 UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA, )  
9 Plaintiff, ) NO. 4:20-cr-06004-SAB  
10 )  
11 vs. ) MOTION AND  
12 JORGE BALLESTEROS, ) DECLARATION TO  
13 ) CONTINUE SUPERVISED RELEASE  
14 Defendant. ) VIOLATION  
 )  
 ) With Oral Argument  
 ) June 23, 2022  
 ) 9:30 a.m. Yakima, WA.

15  
16 COMES NOW the Defendant, Jorge Ballesteros, by and through her attorney of record,  
17 Ricardo Hernandez, and moves this court for an order continuing the Supervised Release  
18 Violation hearing currently set for June 23, 2022 @ 9:30 a.m. to October 19, 2022. This motion  
19 is based upon the court file in the instant case, and the accompanying declaration of counsel.

20  
21 DATED this 17<sup>h</sup> day of June 2022.  
22  
23

24 s/ Ricardo Hernandez  
25 Ricardo Hernandez  
26  
27  
28

## **DECLARATION**

RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and

States as follows:

1. I am the attorney of record for the defendant in the above matter.
2. I am requesting a continuance of the Pre-Trial set for June 23, 2022 @ 9:30 a.m. and Jury Trial hearing date set for July 11, 2022 @ 9:00 a.m. in case number 4:22-cr-06021-SAB
3. I am requesting that this matter be heard at the same time of the pre-trial conference in 4:22-cr-06021-SAB

I hereby certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 17<sup>th</sup> day of June 2022

s/ Ricardo Hernandez  
Ricardo Hernandez

**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2022 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:  
Caitlin A. Baunsgard, Assistant U.S. Attorney.

/s/ Ricardo Hernandez  
Ricardo Hernandez